

CHAPTER 1

1. PURPOSE, NEED, AND BACKGROUND FOR THE PROPOSED ACTION

1.1. Purpose of the Proposed Action

In order to help meet the Tennessee Valley Authority (TVA) systemwide goal of reducing nitrogen oxide (NO_x) emissions 75,000 metric tons per year (83,000 tons per year) beginning in 2005, TVA is proposing the installation of NO_x reduction systems for Units 1 through 5 at its coal-fired Colbert Fossil Plant (COF). NO_x emissions reductions are necessary to meet requirements under Section 110 of the Clean Air Act (CAA).

1.2. Need for the Proposed Action

TVA must meet Title I CAA requirements for ozone for which NO_x is a precursor.

1.3. Background

The following discussion of NO_x air pollution and control technologies was primarily taken from *Pollution Engineering* (Sandell, 1998).

1.3.1. Air Pollution from Nitrogen Oxides

NO_x emissions are a major factor in causing air pollution, including acid rain and high ground-level ozone concentrations. As recently as 1996, more than 50 million Americans were living in areas with unhealthy ozone levels. NO_x also plays a role in elevated levels of fine particulate, a pollutant, the effects of which the United States Environmental Protection Agency (USEPA) is attempting to address by revising the National Ambient Air Quality Standards (NAAQS) to regulate concentrations of particulate matter with aerodynamic diameter of 2.5 microns or less (PM_{2.5}).

NO_x includes nitric oxide (NO) and nitrogen dioxide (NO₂) and is produced in motor vehicle and industrial combustion processes. These byproducts form in three ways: when nitrogen in the fuel combines with oxygen in the combustion air (fuel NO_x); when fuel hydrocarbons break down and recombine with atmospheric nitrogen (prompt NO_x); and when the intense heat of combustion causes atmospheric nitrogen to combine with atmospheric oxygen (thermal NO_x). NO is a colorless gas that is converted in the atmosphere to yellowish-brown NO₂. NO₂ can cause adverse human health effects, including bronchitis, pneumonia, lung irritation, and increased susceptibility to viral infection. Animal studies indicate that intermittent, low-level NO₂ exposure can also induce kidney, liver, spleen, red blood cell, and immune system alterations.

NO_x emissions lead to the formation of ground-level ozone (photochemical smog), which has a strong negative impact on human health and the environment. Ozone impairs lung function and aggravates heart disease and respiratory diseases such as asthma and bronchitis. Ozone also impairs visibility and causes crop and forest damage.

NO_x reacts with oxygen and other components of air to form nitrates, which can coalesce into fine particles. Studies of collected PM_{2.5} suggest that nitrates make up more than 10 percent of the mass of fine particulate in the western two-thirds of the country. PM_{2.5} mass at urban sites in eastern North America contains less than 10 percent nitrate, and rural sites generally contain less than 5 percent on an annual basis.

NO_x also contributes to the formation of acid rain. Acid rain has been shown to destroy fish and other forms of fresh- and coastal-water life and to damage buildings and materials and forests and agricultural crops. In the eastern United States, NO_x emissions are responsible for about one-third of rainfall's acidity over the full year and one-half during the winter.

In 2000, national emissions of NO_x were 24.9 million tons. Electric utility and industrial fuel combustion contributed 8.5 million tons of NO_x, with an almost equal amount coming from mobile sources. Because so many Americans are exposed to smog, USEPA regards ozone as a pervasive air pollutant. Analysis by the Ozone Transport Assessment Group (OTAG) shows significant NO_x reductions are necessary to solve the ozone nonattainment problem that affects many areas of the United States.

The control of NO_x came under intense government scrutiny with the passage of the Clean Air Act Amendments (CAAA) of 1990. Titles I and IV of the CAAA are directly applicable to the reduction of NO_x. Title I deals with the reductions in emissions of air pollutants to attain ambient air quality standards. Ambient ozone levels are the driving force for the installation of NO_x controls under this title. Title I of the CAAA also regulates the emissions of NO_x from municipal solid waste incinerators, both new and existing. Title IV is intended to reduce acid deposition. It primarily affects utility coal-fired boilers and cogeneration boilers with a 25-megawatt (MW) capacity or greater. Title IV of the CAAA required a 2-million-ton reduction in coal-fired utility plant NO_x emissions by the year 2000. TVA complied with requirements by installing low-NO_x burners and overfire air (described below) at many of its power plants.

In addition to the requirements for NO_x reduction derived from the CAAA, state, regional, and local guidelines also set limits for emissions of NO_x from existing sources.

1.3.2. NO_x Control Technologies

Numerous technologies are used to control NO_x. These can predominantly be divided into two main categories: NO_x prevention and NO_x removal. Common prevention alternatives include low-NO_x burners and furnace modifications. Selective noncatalytic reduction (SNCR) and selective catalytic reduction (SCR) are typical post-combustion removal methodologies. A third type of control technology involves control of NO_x as it is formed during the combustion process within the boilers (i.e., NO_xTech).

Prevention Alternatives

In many cases, pollution prevention through the use of low-NO_x burners, overfire air, or low-NO_x combustors is the most effective control approach. Low-NO_x burners can reduce NO_x emissions 20 percent to 60 percent compared to older generation burners. This NO_x control alternative generally has low to moderate capital equipment costs and low maintenance costs.

Furnace modifications such as overfire air, staged combustion, and gas reburning can prevent the formation of NO_x. These modifications can include additional overfire air ports,

which divert approximately 20 percent of the total combustion air to a secondary burning zone above the wind box, thus creating a fireball at or near stoichiometric air conditions. This extends the duration of the primary combustion zone allowing a greater portion of the devolatilization to take place before entering the fireball, thus reducing thermal NO_x production.

With gas reburning, natural gas is injected near the primary combustion zone to reduce the availability of oxygen. A significant portion of the NO_x precursors decomposes and forms other harmless nitrogen species. Overfire air is injected high enough in the furnace to allow sufficient residence time for the reburning reactions to reduce NO_x and its precursors and to complete combustion.

The major drawbacks of each of these technologies include their inability to meet required emission standards or future limits. In addition, in some cases, as for cyclone burners or wet bottom boilers, these technologies may not be applicable. Further, low- NO_x burners also may increase the loss on ignition content of the fly ash, increase furnace and water tube corrosion, lower boiler efficiency, and increase particulate emissions.

Post-Combustion Removal

SNCR is a post-combustion chemical process for the removal of NO_x from combustion gases. A nitrogenous compound, typically ammonia or urea, is injected directly into the hot flue gases. At suitably high temperatures (1600 degrees Fahrenheit [$^{\circ}\text{F}$] to 2100 $^{\circ}\text{F}$), the nitrogenous compound decomposes and chemically reduces the NO_x to form molecular nitrogen and water. The temperature of the hot flue gases is the primary driving force for the reaction, and a catalyst is not needed. The efficiency of the chemical reaction depends on factors that include flue gas temperature, residence time at temperature, amount and type of nitrogenous reagent injected (ammonia or urea), mixing effectiveness, and uncontrolled NO_x levels. Twenty percent to 40 percent reductions of uncontrolled NO_x levels are common. The two primary reagents used for the SNCR process are anhydrous ammonia and urea. Approximately 280 SNCR systems have been installed worldwide for a large variety of industries. In the United States, commercial installations and demonstrations have included most boiler configurations and fuel types as well as other major NO_x -emitting process units such as cement kilns. However, there is little experience on large (greater than 160 MW) boilers in electric utility service. In addition, SNCR operation can result in large amounts of ammonia slip (the emission of unreacted ammonia).

A variation of SNCR for NO_x control involves injection of ammonia and natural gas at controlled rates directly into the hot flue gases of the boilers. These technologies are typically proprietary. The technology has been successfully applied to small boiler units, but, again, the successful application for large generating units at the scale of COF has not been demonstrated to date. Direct injection into the boilers may potentially avoid two factors making SNCR less desirable (discussed below): lower effectiveness in reducing uncontrolled NO_x levels (i.e., 20-40 percent reductions with SNCR) and larger amounts of ammonia slip. TVA conducted a limited demonstration on one unit at its Kingston Fossil Plant (KIF) in January and February 2002 in order to assess the feasibility of application for this technology.

SCR uses a catalyst to promote the chemical reaction between NO_x and a nitrogenous compound, generally ammonia, to produce molecular nitrogen and water. First patented in

1959, SCR is used to reduce NO_x emissions significantly from more than 250 sources in the United States. However, only a few of these sources are coal-fired boilers. There are more than 500 sources worldwide using SCR technology. In the United States, SCR has been applied on utility and industrial boilers, gas turbines, process heaters, internal combustion engines, chemical plants, and steel mills. Reduction levels of better than 90 percent are achievable with SCR given the proper fuel, combustor, and operating parameters.

In the SCR process, the catalyst allows the chemical reaction between NO_x and ammonia to occur at significantly lower temperatures (350°F to 1100°F) and with greater reagent utilization than does the simple SNCR process. An ammonia/air or an ammonia/steam mixture is injected into the combustion gas stream containing the NO_x . The gases are thoroughly mixed and then pass through the catalyst where the NO_x is reduced. The catalyst promotes the reaction but is not consumed by it. The catalyst's effectiveness lessens with time as its surface becomes contaminated with dust or trace elements from the flue gas. Several different catalysts are available for use at different gas temperatures. Base metal catalysts may contain titanium, vanadium, molybdenum, or tungsten. Operating temperature ranges for base metal catalysts are between 450°F and 800°F. For higher temperatures, 675°F to 1100°F, zeolite catalysts have been used. For lower temperatures, 350°F to 550°F, catalysts containing precious metals, such as platinum and palladium, are preferred.

Tightened NO_x removal requirements have resulted in more SCR installations in the United States. Capital and operating costs have dropped rapidly over the past decade as a result of technological innovation, increased manufacturing expertise, and competition among suppliers. Longer-than-expected catalyst lives have contributed to the reduced operating costs.

There is a concern about the use of SCR with high sulfur fuels because sticky ammonium bisulfate can be deposited on the catalyst, air heater, and other downstream surfaces. This compound is formed through the reaction of ammonia with sulfur trioxide (SO_3), which in turn is formed by the oxidation of the sulfur during the combustion process and then through the oxidation of sulfur dioxide (SO_2) by the SCR catalyst. By minimizing ammonia slip and suppressing the oxidation of SO_2 , the amount of ammonium bisulfate may be kept to a level that does not affect boiler operation.

Ammonia slip is caused by the incomplete reaction of injected ammonia with NO_x present in the flue gas. A system designed to achieve good distribution and mixing of the injected ammonia with the flue gas as well as proper catalyst sizing and selection would ensure ammonia slip is controlled to levels low enough that effects on plant operation, ash properties, and health would be insignificant. The drawbacks of SCR technology include the difficulty of storing and transporting ammonia, the high capital cost of the catalyst, the difficulty of thoroughly mixing the injected ammonia prior to the catalyst, maintenance of the required reaction temperatures, and disposal of spent catalysts.

SNCR and SCR may be used as a hybrid system. The SNCR process would provide a substantial portion of the NO_x removal, and the SCR process would both control ammonia slip and perform the remaining treatment. A possible advantage of a hybrid SNCR/SCR system would be a reduction in capital cost since the amount of expensive catalyst required would be reduced.

1.3.3. Colbert Fossil Plant

COF is located in Colbert County, Alabama, about 10 miles west of downtown Tusculumbia and 3 miles east of Cherokee (Figure 1). The plant site is located on the south side of TVA's Pickwick Reservoir at Tennessee River Mile (TRM) 245. The plant and its reservation lie north of U.S. Highway 72. The plant is located on a 1,354-acre (548-hectare) reservation. Most nearby land is agricultural, but residential and recreational areas are in close proximity. The closest residences are within 0.5 mile from the plant reservation.

Units 1 through 4 at the plant were built between 1951 and 1955. First commercial operation began in January 1955. Nameplate generating capacity for Units 1 through 4 is 200 MW per unit. Unit 5 was constructed between 1960 and 1965 and began commercial operation in November 1965. Unit 5 has a nameplate generating capacity of 500 MW. For Units 1 through 5, winter net dependable generating capacity is about 1,204 MW. In addition to the five coal-fired units, TVA completed the installation of eight gas turbine power-generating units in May 1972. Colbert generates about 7.8 billion kilowatt-hours of electricity in a typical year, or enough energy to meet the needs of 550,000 homes.

Coal consumption for Colbert is approximately 3.2 million tons per year. The coal combustion process produces sulfur oxides, NO_x and ash particles (called fly ash or particulate). Large concentrations of these pollutants may adversely affect human health, vegetation, and wildlife. To remove fly ash and reduce stack opacity, high-efficiency electrostatic precipitators or ESPs (which are more than 99 percent efficient) were installed on Units 1 through 4 in 1988. The state of Alabama's limit (excluding allowances for start-up, shutdown, malfunction, and load changes) for opacity at Colbert is 20 percent as measured by USEPA Method 9, but the plant typically operates at less than 12 percent opacity. Prior to 1990, Units 1 through 5 burned Illinois Basin coal. Then between 1990 and 1996, Units 1 through 4 switched to low sulfur coal from eastern Kentucky/Tennessee (<2.0 pounds [lbs] SO₂/ton), but Unit 5 remained with Illinois Basin coal. During 1996, Units 1 through 4 switched to an even lower sulfur coal (Colorado/Powder River Basin blend coal) and Unit 5 continued to burn Illinois Basin coal.

Gaseous emissions from burning coal are dispersed through a 500-foot stack for Unit 5 and a 600-foot stack for Units 1 through 4. To date, installed environmental controls and operations have reduced particulate emissions by more than 99 percent, and boiler optimization operations have modestly reduced NO_x emissions.

1.4. Related National Environmental Policy Act (NEPA) Documents

NEPA documents prepared by TVA related to COF are listed below.

- Colbert Fossil Plant Construction of Skimmer Wall Environmental Assessment (EA) and Finding of No Significant Impact (FONSI). January 2002.
- Colbert Plant Property and Permanent Easement to Colbert County for Water Treatment Plant EA and FONSI. December 1999.

Colbert Fossil Plant Units 1 Through 5
Reduction Systems for Control of Nitrogen Oxides



Figure 1. Map of Colbert Fossil Plant

- Final Environmental Impact Statement for Peaking Capacity Additions. May 1999.
- Energy Vision 2020 - Integrated Resource Plan Environmental Impact Statement. Tennessee Valley Authority. December 1995.
- Environmental Assessment Dry Ash Facility and Dry Storage - Stack Colbert Fossil Plant. January 1981.

1.5. Scoping Process

Members of a TVA interdisciplinary team met three times to review the potential direct and indirect effects of the proposed use of SCR and NO_xTech systems at COF for NO_x control. From these meetings, the following environmental issues were identified for review:

- Beneficial effects to air quality from reducing NO_x emissions
- Contamination of coal combustion byproducts with ammonia
- Contamination of ash pond discharges with ammonia
- Wastewater and impacts to surface water quality from ammonia in the chemical pond and ash pond effluent
- Public and worker safety issues related to the storage and handling of anhydrous ammonia
- Socioeconomic effects of the project related to increased jobs

Issues identified with minor potential for impacts were managed areas and ecologically significant sites; threatened and endangered species; terrestrial ecology; wetlands and floodplains; land use; visual aesthetics; archaeological and historic resources; solid and hazardous waste; aquatic ecology; groundwater quality; and transportation. These major and minor issues were the basis for the evaluations in the EA.

1.6. Public and Agency Involvement

In November 2002, a notice of availability for the Draft EA was published in two newspapers that serve northwest Alabama, *The Times Daily* and *The Colbert County Reporter*. A news release was also sent in November 2002 to the news media. This notice and the news release informed interested persons that copies of the Draft EA were available for review at the Helen Keller Public Library in Tuscumbia (Colbert County), Alabama, the Cherokee Public Library in Cherokee (Colbert County), Alabama, and the Chattanooga- Hamilton County Bicentennial Library in Chattanooga, Tennessee.

In November 2002, copies of the Draft EA were sent to the Alabama Department of Environmental Management (ADEM) and the United States Fish and Wildlife Service (USFWS). The Alabama State Historic Preservation Officer (SHPO) concurred with the proposed project on November 13, 2002, and reiterated concurrence on December 2, 2002, after reviewing the Draft EA (see Appendix B).